

From: Steven Nelson [REDACTED]
To: <Smunro@energy.state.ca.us>
Date: 3/2/2005 1:22:05 PM
Subject: Resend: MEC comments on Amendment

Date: March 2, 2005
To: Steve Munro CEC
Re: Comments on Calpine's amendment to increase startup emissions for the Metcalf Energy Center

Comments:

- 1) As this is a substantial change to the project certified by the CEC in September, 2001 the commission should hold a public hearing so all issues regarding this change are thoroughly examined.
- 2) Please explain why the CEC did not examine the data from the local air monitoring station in Los Paseos Park, approximately one mile from the project site.
- 3) The December 2004 data from the monitoring station in Los Paseos Park shows on December 17, 2004 at 1300 a one hour reading of 175 ppb of NO2. Using the EPA conversion calculator on their web site shows 175 ppb to be 334 ug/m3.

If this ambient level is used in calculating the maximum one hour NO2 impact for startup we have $187.9 + 334 = 521.9$ ug/m3, which is over the California state NO2 one hour standard of 470 ug/m3. For commissioning we have $192.8 + 334 = 526.8$ ug/m3 for the one hour NO2 impact, which is again over the California state one hour standard for NO2.
- 4) Please explain why the CO ambient levels used in the September 2001 decision were not used in the CEC's analysis of Calpine's amendment to calculate the maximum impact.
- 5) Please explain why toxic air contaminants were not analyzed. The public has shown great concern over startup emissions. Please explain how the Commission will ensure that contaminants such as Acrolein do not pose a health risk during startup. Please consider adding a condition for source testing at various levels of startup to determine the health risk of toxic air contaminants.
- 6) The CEC should wait until BAAQMD has completed its analysis before this issue goes before the CEC Commissioners. As the schedule stands now, the CEC Commissioners will rule on this issue before BAAQMD's public comment period has closed.
- 7) Please explain why the CEC has not resolved the conflicting testimony in the record regarding PM10 emission rates. Calpine testified that adding an oxidation catalyst would increase the PM10 emission rates but this increase has never been addressed by the CEC.

8) There appears to be a conflict between the CEC and BAAQMD regarding the sulfur content of the natural gas. Please explain how much sulfur content will be allowed.

Sincerely,

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